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19 Freedom Mortgage Corporation

20 **UNITED STATES DISTRICT COURT**

21 **DISTRICT OF NEVADA**

22 TIFFANY KEITH and STEVEN KEITH,

23 Plaintiffs,

24 v.

25 TRANS UNION LLC; EQUIFAX
26 INFORMATION SYSTEMS, LLC; and
27 FREEDOM MORTGAGE CORPORATION,

28 Defendants.

CASE NO.: 2:22-cv-00059-RFB-DJA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
FREEDOM MORTGAGE
CORPORATION TO RESPOND TO
COMPLAINT**

(First Request)

29 Plaintiffs Tiffany Keith and Steven Keith (“Plaintiffs”) and Defendant Freedom
30 Mortgage Corporation (“Freedom”), by and through their respective undersigned counsel,
31 hereby stipulate and agree that Freedom shall have an extension of time until March 8, 2022, in
32 which to respond to Plaintiffs’ complaint.

33 This is the first stipulation for extension of time to respond to the complaint. Nothing in

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1 this Stipulation and Order is intended to be, or will be, construed as an admission of the claims
 2 or defenses of the parties. This Stipulation is made in good faith in an effort to enable Freedom
 3 fully explore the allegations in the complaint.
 4

5 DATED this 7th day of February, 2022.

6 SMITH LARSEN & WIXOM

7 /s/ Karl L. Nielson

8 Karl L. Nielson, Esq.

9 Nevada Bar No. 5082

10 1935 Village Center Circle

11 Las Vegas, Nevada 89134

12 And

13 Gregg D. Stevens, Esq.

14 *(Pro Hac Vice* forthcoming)

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16 6688 N. Central Expressway, Ste 400

17 Dallas, TX 75206

18 Attorneys for Defendant

19 Freedom Mortgage Corporation

20 DATED this 7th day of February, 2022.

21 PRICE LAW GROUP, APC

22 /s/ Steven A. Alpert

23 Steven A. Alpert, Esq.

24 Nevada Bar No. 8353

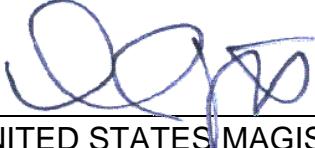
25 5940 S. Rainbow Blvd., Suite 3014

26 Las Vegas, Nevada 89118

27 Attorneys for Plaintiffs,

28 Tiffany and Steven Keith

17 IT IS SO ORDERED.

18 
 19 UNITED STATES MAGISTRATE JUDGE

20 DATED: February 7, 2022